UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	**MDL No. 2875**
THIS DOCUMENT RELATES TO ALL CASES	**HON. ROBERT B. KUGLER**

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Seth A. Goldberg, Esq,**
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, Pennsylvania 19103
Attorneys for Defendants

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition via Zoom, of David Chesney, on March 21, 2022, at 9:30 a.m. eastern time, and continuing until completion, at Skadden, Arps, Slate, Meagher & Flom LLP, 500 Boylston St, Boston, Massachusetts 02116, via Zoom. The witness shall produce the documents requested at Exhibit A, attached hereto, at least two days in advance of the deposition, to the extent not already served upon Plaintiffs.

TAKING ATTORNEY FOR PLAINTIFFS:

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The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

March 14, 2022

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/Adam M. Slater
ADAM M. SLATER
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103 Eisenhower Parkway
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EXHIBIT A

DOCUMENT REQUESTS

1) Copies of all invoices for work performed in connection with any consultation or expert work performed for or on behalf of any defendant or their counsel with regard to any issues in this MDL, including but not limited to for the review of documents, review and consultation with regard to plaintiff experts, preparation of Mr. Chesney's reports, and preparation for deposition or trial. Note: If the witness does not have up to date invoices, the witness is requested to be prepared to orally provide the dates, time amounts, and subject matter of all such work.

2) Copies of any notes, i.e. written or electronic, reflecting any consulting or litigation work related to this MDL, whether or not documented in invoices.

3) Copies of any notes or other documentation, including PowerPoints, for any presentations, seminars, or classes, given by Mr. Chesney with regard to the FDA's regulation of API and finished drug products, FDA inspections, current good manufacturing processes, and the risks and benefits of any angiotensin II receptor blockers or nitrosamines.

4) Copies of any documents or articles relied upon for the opinions set forth in the reports served in this MDL, whether or not listed in the report.

5) Copies of any documents or articles reviewed in connection with the report served, whether or not listed in the report or attachments thereto.

6) Any illustrations, PowerPoints, images, charts, tables or demonstrative exhibits that may be used by or with Mr. Chesney in connection with a *Daubert* hearing or trial testimony in this litigation.

7) Documentation of any research grant the witness has been provided to study the FDA's regulation of API and finished drug products, FDA inspections, current good manufacturing processes, and the risks and benefits of any angiotensin II receptor blockers or nitrosamines.

8) Documentation of any research the witness has performed with regard to the FDA's regulation of API and finished drug products, FDA inspections, current good manufacturing processes, and the risks and benefits of any angiotensin II receptor blockers or nitrosamines.

9) Any documents or other communications the witness has received from any person or entity with regard to the FDA's regulation of API and finished drug products, FDA inspections, current good manufacturing processes, and the risks and benefits of any angiotensin II receptor blockers or nitrosamines, outside of information provided by counsel who retained the witness.

10) Any communications from the witness to any person or entity with regard to the FDA's regulation of API and finished drug products, FDA inspections, current good manufacturing processes, and the risks and benefits of any angiotensin II receptor blockers or nitrosamines, outside of communications to counsel who retained the witness.

11) Any textbook referenced by the witness in forming his opinions.

12) Documentation of any work performed for or on behalf of any defendant and/or defense law firm, involved in this MDL, at any time.

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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2022, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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